

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



September 5, 2018

GI-2018-08-PGE-02 (Lafayette)

Mr. Sumeet Singh, Vice President (s1st@pge.com)
Pacific Gas and Electric Company
Portfolio Management & Engineering
6111 Bollinger Canyon Road, Room 4590-D
San Ramon, CA 94583

SUBJECT: General Order 112-F Gas Inspection of PG&E's Transmission Facilities in the City of Lafayette

Dear Mr. Singh:

On behalf of the Safety and Enforcement Division (SED) of the California Public Utilities Commission, Joel Tran, Alula Gebremedhin, Alan Wehrman, Andrew Kwan, and Tyler Holzschuh conducted a General Order 112-F inspection of Pacific Gas & Electric Company's (PG&E) transmission facilities within the City of Lafayette from August 13-17, 2018. The inspection included a review of operation and maintenance records for the years 2010 through 2017, PG&E's Geohazards Assessments for Las Trampas Creek, and a field inspection of a representative sample of facilities. SED staff also reviewed operator qualification records, which included a field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by PG&E to address the violations in the Summary.

If you have any questions, please contact Joel Tran at (415) 515-3442 or by email at joel.tran@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, reading "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

cc: Susie Richmond, PG&E (gsr8@pge.com)
Mike Bradley, PG&E (M0BJ@pge.com)
Dennis Lee, SED (dennis.lee@cpuc.ca.gov)
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SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

SED Findings

1. Title 49 CFR §192.605(a) states in part:

“Each operator shall prepare and follow for each pipeline, a manual of written procedures for conducting operations and maintenance activities and for emergency response.”

PG&E procedure TD-4540P-01, Section 1.3 under Preliminary Maintenance Steps, states in part:

“6. Ensure accuracy of both station diagram copies...”

During records review of pressure regulating stations, SED observed that Regulator Station RW-38 had a mapping error. The Operating Diagram labeled a Pilot Operated Regulator (Regulator R10) as a Valve. PG&E has issued a Corrective Action Plan (CAP) to correct the Operating Diagram to correctly indicate R10 as a Regulator (CAP Notification Number: 114898249 on 8/13/2018).

2. Title 49 CFR §192.707(a) states in part:

“Buried pipelines....a line marker must be placed...(2) Wherever necessary to identify the location of the transmission line or main to reduce the possibility of damage or interference.”

PG&E procedure TD-4412P-09, Section 1.3 under Pipeline Marker Requirements, states in part:

“Install markers within line of sight of one another (by the unaided eye).”

During field inspections at Las Trampas Creek - Geohazard site B-1, SED observed that PG&E is not maintaining line of sight at the location, as there was only one visible pipeline marker. PG&E does not have any visible pipeline markers at Las Trampas Creek - Geohazard site A-1. PG&E has issued a CAP to install new pipeline markers (CAP Notification Number: 114896872 on 8/16/2018).